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January 18, 2023

Via ECF

Honorable Leda Dunn Wettre. USMJ
Martin Luther King Building & U.S. Courthouse (MLK 3C)
50 Walnut Street
Newark, New jersey 07101

Re: *Parks, Nijeer v. McCormack, John, et al*
Civil Action 2:21-cv-04021


Dear Judge Wettre:

Plaintiff has retained Ralph Cilento as his liability expert.

It is respectfully requested that the due date for his report as set forth in the Amended Scheduling Order of November 30, 2022, be pushed back by six weeks from February 14, 2023, until April 1, 2023. Mr. Cilento is currently on trial and expects this to take at least two weeks. Moreover, Defendant Woodbridge is seeking to take the depositions of the Middlesex County Prosecutor defendants which, if allowed, will result in significant additions to the factual record (which is already substantial) and which would need to be reviewed by Plaintiff's expert.

Defense counsel have all consented to this request.

Respectfully yours,



Daniel W. Sexton

DWS/swd

cc *Frederick L. Rubenstein via ECF only*
Phoenix Meyers, DAG via ECR only
Client via email only